

ORIGINAL
FILE



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December 28, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N. W., Room 222
Washington, D. C. 20554

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DEC 28 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of
Administration of the North
American Numbering Plan

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CC Docket No. 92-237
PHASES ONE and TWO

Dear Ms. Searcy:

Enclosed for filing is the original and five copies of Cincinnati Bell Telephone Company's Comments in the above-referenced matter.

Please date stamp and return the enclosed duplicate copy of this letter as acknowledgement of its receipt. Questions regarding this filing should be directed to Mrs. Debbie Davidson at the above address or by telephone on (513) 397-1333.

Sincerely,

Robert E. Sigmon

Enclosures

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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Administration of the North) CC Docket No. 92-237
American Numbering Plan) PHASES ONE and TWO

COMMENTS OF
CINCINNATI BELL TELEPHONE COMPANY

Cincinnati Bell Telephone Company ("CBT") respectfully submits the following comments to the Commission's Notice of Inquiry (the "NOI") released on October 29, 1992 in the above-captioned proceeding.^{1/}

I. INTRODUCTION

The Commission initiated this proceeding to explore several long range issues related to the administration of the North American Numbering Plan ("NANP").^{2/} Phase One of the NOI focuses on who should administer the NANP and how the administration might be improved.^{3/} Phase Two seeks comments on the costs, benefits, and technical issues associated with

^{1/} Administration of the North American Numbering Plan, CC Docket No. 92-237, Notice of Inquiry, FCC 92-470, released October 29, 1992.

^{2/} NOI, at paragraph 1.

^{3/} NOI, at paragraph 3.

expanding the Carrier Identification Codes used for Feature Group D access to a four-digit format.^{4/} CBT's comments on Phase One and Phase Two of the NOI are set forth in separate sections below.

II. PHASE ONE COMMENTS

The NOI invites comments on the advisability of transferring NANP administration to an administrator other than Bellcore.^{5/} CBT submits that such a transfer would be undesirable, and may in fact result in less efficient administration of the NANP. As noted by the Commission, Bellcore has administered the NANP over a long period of time with considerable skill and foresight.^{6/} As a result, Bellcore has the skill and expertise necessary to successfully administer the NANP. A transfer to some other entity could create problems because the new administrator would have to devote a substantial amount of time to developing the necessary technical resources already possessed by Bellcore.

The NOI notes that some parties believe that administration of the NANP by Bellcore involves an inherent

^{4/} NOI, at paragraph 3.

^{5/} NOI, at paragraph 28.

^{6/} NOI, at paragraph 23. Indeed, the Commission even stated that the NANP is the envy of the rest of the world.

conflict of interest.^{7/} This belief is apparently based upon the fact that Bellcore is owned by the Bell Operating Companies. Bellcore has, however, stated that it does not discriminate in favor of its owners.^{8/} In fact, Bellcore has maintained that the NANP administrator operates in a "fish bowl", resolving problems in forums that include all facets of the industry.^{9/} Bellcore points out that these forums provide both an opportunity to gain a consensus and an opportunity for other parties to challenge Bellcore's decisions.^{10/} In Bellcore's view, the absence of complaints indicates the fairness of the current process.^{11/}

In spite of Bellcore's stated efforts to administer the NANP in a fair and impartial manner, the perception that Bellcore's owners have an inherent advantage over other parties apparently persists. CBT submits that there is nothing to support a conclusion that Bellcore's administration of the NANP has been anything but fair and impartial. However, if the Commission nonetheless determines that additional oversight of the current process should be instituted, CBT believes the

^{7/} NOI, at paragraph 25.

^{8/} NOI, at paragraph 27.

^{9/} NOI, at footnote 41.

^{10/} Id.

^{11/} Id.

establishment of an industry advisory board to guide Bellcore on issues relative to the administration and design of the NANP would be the most appropriate course of action. Such an advisory board, made up of representatives from all segments of the industry, should minimize any perceived inequities in the current process. In addition, the cost of administering the NANP could be spread among all industry players to help eliminate any perception that Bellcore's owners have an inherent advantage over other parties because they fund the NANP.

While the issue of who should ultimately administer the NANP is important, the Commission should make no changes until the implementation of interchangeable NPA codes has been achieved. The availability of interchangeable NPA codes, currently scheduled to be implemented by January 1, 1995, will vastly increase the supply of available codes, and any change in the administration of the NANP should be coordinated with this increase.

III. PHASE TWO COMMENTS

The NOI seeks comments on several questions regarding the conversion of Feature Group D carrier identification codes to a four-digit format.^{12/} CBT takes no position on the

^{12/} NOI, at paragraph 38.

specific questions posed, but submits that whatever the Commission decides in this regard it should not mandate a specific date for all companies to implement such a conversion. Due to the engineering and administrative costs involved, implementation of the four-digit format should only be required if demand exists for such a format (i.e., where there has been a bona fide request). The Commission should also recognize that demand for a four-digit format is likely to vary among the central offices in each LEC's service territory. In CBT's service territory, demand for a four-digit format may be immediate at some central offices; however, at others, demand may never develop. Therefore, the Commission should not require LECs to simultaneously convert all their central offices to a four-digit format.

The NOI references an agreed upon format for implementation of Feature Group D expansion tentatively scheduled to take effect in 1995.^{13/} In order to meet this proposed implementation date, CBT would have to accelerate the replacement of two switches at a cost of approximately \$2,500,000 each, plus associated cutover expenses. In addition, CBT already has other switches scheduled for cutover in 1995. As a result, CBT is concerned that it may not have the personnel and resources necessary to accomplish these

^{13/} NOI, at paragraph 37.

additional switch cutovers in such a short period of time. CBT would also incur additional expenses associated with updating its other switches with the proper generics to handle a four-digit format. In light of these significant expenses, LECs like CBT should not be required to implement Feature Group D expansion until demand for such expansion exists. Conversion to a four-digit format should be driven by market forces in each LEC's territory; not by a uniform Commission mandate.

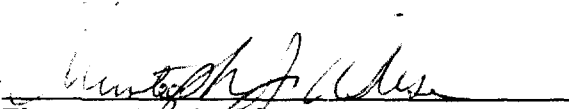
IV. CONCLUSION

CBT urges the Commission to consider the comments set forth herein as it explores issues related to administration of the NANP.

Respectfully submitted,

FROST & JACOBS

By


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Dated: December 28, 1992

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CERTIFICATE OF SERVICE

I, Debbie L. Davidson, hereby certify that the persons listed below have been served with a copy of the Comments in CC Docket 92-237 of Cincinnati Bell Telephone Company this 28th day of December, 1992.

Debbie L. Davidson

Debbie L. Davidson

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